1	THOMAS M. HERLIHY (SBN 83615)			
2	Thomas.Herlihy@wilsonelser.com SHIVANI NANDA (SBN 253891)			
3	Shivani.Nanda@wilsonelser.com WILSON, ELSER, MOSKOWITZ,			
4	EDELMAN & DICKER LLP 525 Market Street, 17th Floor San Francisco, California 94105 Tel: (415) 433-0990 Fax: (415) 434-1370			
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7	Attorneys for Defendant AMERICAN NATIONAL INSURANCE COMPANY			
8	UNITED STATES DISTRICT COURT			
9	NORTHERN DISTRICT OF CALIFORNIA			
10	SAN FRANCISCO DIVISION			
11	DAPHNE P. RAND, by and through DEBRA J. ) Case No.: CV09-0639 WDB DOLCH, as Conservator of the Person and Estate )			
12	of DAPHNE P. RAND, Conservatee, on Behalf of ) STIPULATION REGARDING DATE Themselves and All Others Similarly Situated, ) TO ANSWER OR OTHERWISE			
13	) RESPOND TO PLAINTIFF'S Plaintiff, ) COMPLAINT; AND [PROPOSED]			
14	) ORDER			
15	v. )   Local Rule 6-1]   AMERICAN NATIONAL INSURANCE )			
16	COMPANY, a Texas corporation,  Courtroom : 4  Honorable Wayne D. Brazil			
17	Defendant. ) Filed : 02/12/09			
18	) 1 Tiled . 02/12/09			
19	IT IS HEREBY STIPULATED, pursuant to Local Rule 6-1, by and between plaintiff			
20	Daphne Rand, by and through Debra J. Dolch, as Conservator of the Person and Estate of Daphne			
21	P. Rand, Conservatee, on Behalf of Themselves and All Others Similarly Situated ("Plaintiff") and			
22	defendant American National Insurance Company ("Defendant"), through their attorneys of record,			
23	as follows:			
24	1. On or about February 13, 2009, defendant American National Insurance Company			
25	received a Notice of Lawsuit and Request For Waiver of Service of Summons regarding this action,			
26	along with a copy of the Summons and Complaint;			
27				
28	1 STIPULATION REGARDING DATE TO ANSWER OR OTHERWISE RESPOND TO			
	PLAINTIFF'S COMPLAINT; AND [PROPOSED] ORDER			

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1	2.	Defendant has ag	greed to waive service of the Summons and Complaint in this action;		
2	3.	The parties have agreed that defendant's response to the Complaint shall be due or			
3	or before Ma	efore March 27, 2009; and			
4	4.	This stipulated date for Defendant to respond to the Complaint will not alter the date			
5	of any event or any deadline already fixed by Court order.				
6					
7 8	Date: March	6, 2009	WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP		
9					
10			By: <u>/s/ Thomas M. Herlihy</u> THOMAS M. HERLIHY		
11			Attorneys for Defendant AMERICAN NATIONAL INSURANCE COMPANY		
12 13	Date: March	6, 2009	BONNETT, FAIRBOURN, FRIEDMAN &		
14			BALINT, P.C.		
15					
16			By: <u>/s/ Andrew S. Friedman</u> ANDREW S. FRIEDMAN		
17			Attorneys for Plaintiff DAPHNE P. RAND		
18					
19			ORDER		
20	IT IS SO OI	RDERED.	TES DISTRICT		
21					
22	Date: 3/9/20	009	By: SO ORDERED RAZIII		
23			Rail () Deril ()		
24			Judse Wayne D. Brazil		
25			Judge		
26			THE OF CE		
27			DISTRICT OF CO		
28	CT	TOUL ATION DECA	2 RDING DATE TO ANSWER OR OTHERWISE RESPOND TO		

PLAINTIFF'S COMPLAINT; AND [PROPOSED] ORDER
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